

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

**Caption in Compliance with
D.N.J.LBR 9004-1**

STEWART LEGAL GROUP, P.L.

Formed in the State of Florida

Gavin N. Stewart, Esq.

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Attorney for Creditor

In re:

Saniye F. Muftuoglu,

Debtor.

Chapter 7

Case No. 20-10833-CMG

Hearing Date: June 16, 2020

Judge Christine M. Gravelle

NOTICE OF MOTION TO VACATE AUTOMATIC STAY

TO:

Saniye F. Muftuoglu
295 Gemini Dr. Unit 3B
Hillsborough, NJ 08844
Debtor

Michael McLaughlin
Law Offices of Michael McLaughlin, LLC
72 West End Avenue
Somerville, NJ 08876
Attorney for Debtor

Andrea Dobin
McManimon, Scotland & Baumann, LLC
427 Riverview Plaza
Trenton, NJ 08611

PLEASE TAKE NOTICE that on June 16, 2020 at 10:00 AM or as soon thereafter as counsel can be heard, the undersigned attorney for Specialized Loan Servicing LLC as servicing agent for MEB LOAN TRUST IV (“Movant”), will move before United States Bankruptcy Court,

Honorable Christine M. Gravelle, U.S.B.J., Courtroom Number 3, 402 East State Street, Trenton, NJ 08608, for an Order Vacating the Automatic Stay with respect to the following property: 295 Gemini Dr., Unit 3B, Hillsborough Township, New Jersey, 08844 (“Property”).

PLEASE TAKE FURTHER NOTICE that the Motion is based on the lack of equity in the Property and the inadequate protection of Movant’s interest in the Property. Movant asserts that the facts and law it relies upon in making this Motion are neither complicated nor unique, and therefore no brief or legal memorandum is necessary pursuant to D.N.J. LBR 9013-1. Movant shall rely on the Certification and Proposed Order attached hereto.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested shall be in writing, specify with particularity the basis for such objections, and be filed with and served on counsel for Movant, Stewart Legal Group, P.L., 401 East Jackson Street, Suite 2340, Tampa, FL 33602, so as to be received no later than seven (7) days before the return date. Unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LRB. 9013(a).

Dated: May 21, 2020

Stewart Legal Group, P.L.
Attorney for Movant

By: /s/Gavin N. Stewart
Gavin N. Stewart